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**Subject:** MVN-2013-02944-WII - Enterprise Products Operating  
**Date:** Friday, June 6, 2014 3:11:28 PM

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James,

The U.S. Environmental Protection Agency (EPA) has reviewed the Joint Public Notice (JPN), dated May 19, 2014, concerning Department of the Army Permit Application Number MVN-2013-02944-WII. The applicant, Enterprise Products Operating, LLC, is proposing to install, operate and maintain approximately 52.5 mile of 20-inch ethane gas pipeline with a 75-foot construction right-of-way (ROW) and 50-foot permanent ROW. Work would be conducted in Assumption, Ascension, Iberville, and St. Martin Parishes. According to the JPN, the proposed project would permanently impact approximately 160.34 acres of wetlands through conversion of habitat within the permanent right of way and 9.98 acres due to fill, and temporarily impact 208.04 acres of wetlands during construction, for a total of 378.36 acres of jurisdictional wetlands impacted.

The comments that follow are being provided for use in reaching a decision relative to compliance with the EPA's *404(b)(1) Guidelines for Specification of Disposal Sites for Dredged or Fill Material (40 CFR Part 230)*.

- The applicant proposes to mitigate unavoidable wetland impacts by purchasing mitigation credits from Corps approved mitigation banks in the New Orleans District, as well as by creating permittee-responsible mitigation (PRM) sites, according to the JPN. There are currently no details regarding the PRM plans or mitigation banks to be used. Since the pipeline will result in wetland impacts across the four hydrologic basins the pipeline traverses, the EPA recommends that the final mitigation plan employ a watershed approach. To the maximum extent practicable, impacts should be mitigated in-kind, and any final mitigation plan should be designed to fully replace the loss of wetland functions and ecosystem services according the results of an appropriate functional assessment such as the MVN MCM, and be reviewed and approved by EPA and other regulatory and resource agencies. Depending upon the habitat types present, it may be appropriate to mitigate impacts occurring within the Louisiana Coastal Zone through the purchase of coastal prairie credits.
- The nature of impacts to wetlands in temporary rights of way and work spaces should be specified. How many acres of each wetland type will be temporarily impacted? Any clearing of forested and scrub-shrub wetlands within the temporary right should be included in credit calculations and mitigated as long-term impacts.
- The width of temporary and permanent ROW located in wetlands should be minimized to the greatest extent practicable. Is it possible for the applicant to further reduce ROW width from the proposed widths, within jurisdictional areas? In addition, have existing ROW been used to the maximum extent practicable?
- Best management practices (BMPs) such as the use of sediment/erosion control structures should be implemented throughout construction to reduce the flow of nonpoint source pollution into adjacent wetlands and waters of the U.S. All temporary ROW and work spaces should be restored to as near to pre-project conditions as possible when construction is completed.

Thank you for the opportunity to review and comment on the JPN. If you have any further questions, please do not hesitate to contact me at [kitto.alison@epa.gov](mailto:kitto.alison@epa.gov), or 214-665-7482.

Best regards,  
Alison Kitto  
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